

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

United States of America,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:19-cr-090
vs.	)	
	)	
Mario R. Garmoo,	)	
	)	
Defendant.	)	

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**MOTION FOR FURLOUGH**

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Comes now Defendant, Mario R. Garmoo (hereinafter Mario), by and through his attorney, and for his Motion for Furlough states and alleges as follows:

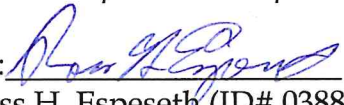
1. Mario is presently in custody and is housed at the Heart of America Correctional and Treatment Center in Rugby, North Dakota. Mario has been in custody for more than a year.
2. Mario is scheduled for trial on December 1, 2 and 3, 2020 in Bismarck, North Dakota. It is anticipated, however, that Mario will be changing his plea prior to trial.
3. Mario just recently learned that his brother, Donnie Malone, Jr. died on November 2, 2020. The funeral is scheduled for November 12, 2020 in Detroit, Michigan. Swanson's Funeral Home on East Grand Boulevard in Detroit, Michigan is handling the funeral arrangements.
4. Mario is requesting a furlough to attend the funeral.

5. Mario's travel arrangements are being finalized at the present time. Presently, it is anticipated that on November 10 or 11, 2020 that Dani Jo Colleen (hereinafter Dani), a family friend of Mario's would drive Mario from the Heart of America Correctional and Treatment Center in Rugby, North Dakota to the airport in Bismarck, North Dakota. Mario would fly from Bismarck to Minneapolis, Minnesota to Detroit, Michigan. While in Michigan for the funeral, Mario's mom, Denice Devine Matthews (hereinafter Denice) would be in custody of Mario and his transportation. For the return trip, Denice would transport Mario to the Detroit airport, and Mario would fly from Detroit to Minneapolis to Bismarck, and Dani would transport Mario from the Bismarck airport to the Heart of America Correctional and Treatment Center in Rugby, North Dakota. The return travel date would be anticipated to be November 14, 2020.
6. More specific travel details will be provided as they become available, and Mario will supplement this Motion with those details as they become available.
7. Mario knows, understands and agrees that he will not use any alcohol, drugs nor inhalants while on furlough.
8. Mario also is willing to be subject to whatever reasonable terms and conditions the Court would place upon him while Mario is on furlough.

WHEREFORE, Mario prays that this Court grant Mario his furlough, and that this Court grant such other and further relief as may be just and equitable in the premises.

Dated this 6<sup>th</sup> day of November, 2020.

**BORMANN, MYERCHIN,  
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By:   
Ross H. Espeseth (ID# 03880)